

EXHIBIT “A”

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

COREY O. WHITE, PRO'SE
PLAINTIFF

V.

CITY OF PHILADELPHIA et, al.

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CIVIL ACTION LAW
CASE# 02/4066
JURY TRIAL DEMANDED

TO: ROBIN B. ARNOLD, DEPUTY SOLICITOR
CITY LAW DEPARTMENT
1515 ARCH STREET 14th. FLOOR
PHILA, PA. 19102-1595

Dear Robin B. Arnold,

My reason for contacting you is because it is my understanding that according to the Rules Of Civil Percedure, there should have been a conference between the two of us to discuss Discovery, Persuant Rules 26(f) and 16(b) F.R.C.P., I'm not certain as to if these Rules applie to me, but because there has not been an order issued by the court to proceed with discovery according to the above Rules, I'm going to respectfully request that you honor my request for discovery persuant Rule 34(a) and (b) F.R.C.P.. Please find my request for Discovery attached. Thank yo for your time in listening.

SINCERLY YOUR'S

Corey White
Pro'Se

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

COREY O. WHITE
PRO'SE PLAINTIFF
V.

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CIVIL ACTION LAW
CASE#02/4066
JURY TRIAL DEMANDED

CITY OF PHILADELPHIA ET,AL.

PLAINTIFFS REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS
(PERSUANT RULE 34(b)FED.R.CIV.P.)

TO: MRS.ROBIN B.ARNOLD,DEPUTY CITY SOLICITOR
CITY OF PHILADELPHIA LAW DEPARTMENT
1515 ARCH STREET 14thFLOOR
PHILADELPHIA PA,19102,1595

NOW HERE COMES,COREY O.WHITE PRO'SE PLAINTIFF,TO REQUEST OF THE
DEFENSE ATTORNEY ROBIN B.ARNOLD THE PRODUCTION OF DOCUMENTS AND-
THINGS PERSUANT RULE 34(b)FED.R.CIV.P..PLAINTIFF RESPECTFULLY
REQUEST THE FOLLOWING:

1.WARDEN DUNLEVY OF CURRAN FROMHOLD CORRECTIONAL FACILITY (C.F.C.F.)
IN PHILADELPHIA,PA,7901 STATE ROAD PHILA.PA,19136

DOCUMENTS AND THINGS REQUESTED:

PHOTOS AND STATMENT TAKEN BY,
LT.CASERTA,SGT.McCALLISTER,C/O NOLAND AND REGISTERED NURSE THOMAS
ON OR ABOUT FEB.8th THRU 12th,2002,WHILE THEY WERE ON DUTY ON 3-11 SHIFT.
PHOTOS OF THE INJURIES AND STATMENT OF COREY O.WHITE A/K/A GREGORY DAVIS-
PP# 655-200.

THE PHOTOS AND STATMENTS ARE NECESSARY TO SUPPORT THE PLAINTIFFS CLAIM
THAT HE IS A VICTIM OF POLICE BRUTALITY AND EXCESSIVE USE OF FORCE,AND
THAT THE INJURIES DOCUMENTED BY PHOTOGRAPH WERE EXTENSIVE AND QUESTIONED
BY THE CORRECTIONAL OFFICERS THAT ADMITTED HIM INTO C.F.C.F..THE PHOTOS
WERE TAKEN BY THESE OFFICERS TO RELIEVE THEM OF THE RESPONSIBILITY FOR
THE PLAINTIFFS INJURIES WHEN HE WAS DELIVERED TO THEM BY THE PHILADELPHIA
POLICE DEPARTMENT.

DOCUMENTS AND THINGS REQUESTED:

DISCIPLINARY RECORDS FOR THE FOLLOWING OFFICERS OF THE PHILADELPHIA POLICE DEPARTMENT, EMPLOYED AT THE 12th DISTRICT, 65th AND WOODLAND AVE. PHILA, PA, 19143.

OFFICER IANACONE, BADGE# 2281
OFFICER BLOCKER, BADGE# 4553
OFFICER McDONALD, BADGE# 7431
OFFICER ROMAN, BADGE# 4035

THESE DISCIPLINARY RECORDS ARE NEEDED TO SUPPORT THE PLAINTIFF'S CLAIM THAT THE ABOVE OFFICERS, INVOLVED IN THE INCIDENT THAT CAUSED THE ACTION PENDING BEFORE THIS COURT, HAVE A HISTORY, AND PRACTICE A CONTINUING PATTERN OF ABUSIVE BEHAVIOR, AND EXCESSIVE USE OF FORCE IN THEIR INTERACTION WITH INDIGENT AFRICAN AMERICAN ALLEGED CRIMINAL DEFENDANTS.

3. MEDICAL DEPARTMENT OF S.C.I. GRATERFORD, P.O. BOX 244 GRATERFORD PA, 19426
SUPERVISED BY DR. RALPH SMITH, MEDICAL DIRECTOR.

DOCUMENTS AND THINGS REQUESTED:

ALL MEDICAL RECORDS OF COREY O. WHITE INST.# EB-0632

THESE MEDICAL RECORDS ARE NECESSARY TO THE PLAINTIFFS CLAIM TO SUBSTANTIATE THAT THE INJURIES HE SUFFERED WERE PRESENT UPON HIS RECEPTION TO THE FACILITY AND THAT HE WAS UNDER MEDICATION FOR.

4. MEDICAL DEPARTMENT OF CURRAN FROMHOLD CORRECTIONAL FACILITY, 7901 STATE-ROAD PHILA, PA, 19136

DOCUMENTS AND THINGS REQUESTED:

ALL MEDICAL RECORDS OF COREY O. WHITE A/K/A GREGORY DAVIS, PP# 655-200.

THESE MEDICAL RECORDS ARE NECESSARY TO THE PLAINTIFFS CLAIM TO VERIFY THE INJURIES HE SUSTAINED BY THE POLICE IN THIS MATTER, THAT WERE PRESENT UPON HIS RECEPTION TO THAT FACILITY AFTER HIS INITIAL BOOKING.

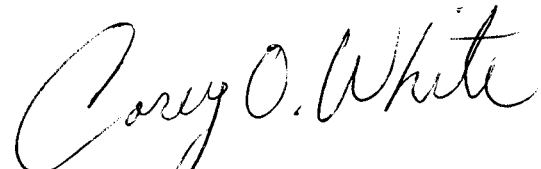
5. DEFENDERS ASSOCIATION OF PHILADELPHIA 1441 SANSOM STREET PHILA. PA. 1910
DENNIS KELLY, ESQ. AND ANDREA I. KONOW OF THE DEFENSE ATTORNEYS AND THE DISCOVERY UNIT FOR THE DEFENDERS ASSOCIATION.

ALL NOTES AND STATEMENTS IN THEIR PERSONAL FILES AS PART OF DISCOVERY FOR THE FALSE CRIMINAL CHARGES, THAT RESULTED FROM THIS INCIDENT FOR WHICH THEY REPRESENTED THE PLAINTIFF. CASE #0204-0106 SENTENCE DATE 8-30-02

THESE DISCOVERY MATERIALS IN THEIR POSSESSION ARE ESSENTIAL TO THE PLAINTIFFS CLAIM TO SUPPORT THAT THE CHARGES AGAINST HIM WERE FABRICATED AND HE WAS COERCED AND THREATENED TO ENTER A PLEA ON THE CRIMINAL CHARGES THAT WERE LODGED AGAINST HIM.

ATTACHED AS AN EXHIBIT TO THE REQUEST IS A COPY OF A LETTER OF RESPONSE FROM ROBIN B.ARNOLD REPRESENTING THE CITY OF PHILADELPHIA IN THIS MATTER. THE LETTER INDICATES THAT THE PLAINTIFF HAS EXCERSIZED A GOOD FAITH EFFOR TO OBTAIN SOME OF THE MATERIALS RQUESTED,IN ACCORD WITH THE PROVISIONS OF F.R.CIV.P.,RELATING TO THE REQUIRED DISCOVERY,UNDER RULE 26.

DATED: 1/30/ 2003

A handwritten signature in cursive script that reads "Corey O. White". The signature is written in dark ink and is positioned above the printed name of the signatory.

RESPECTFULLY SUBMITTED
COREY O.WHITE PRO'SE PLAINTIFF

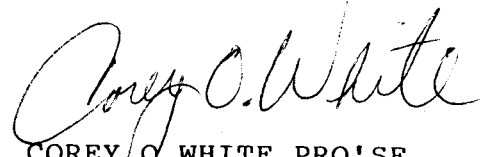
I, COREY O. WHITE, DO HEREBY VERIFY THAT THE FACTS SET FORTH IN THE PLAINTIFF'S REQUEST OF PRODUCTION OF DOCUMENTS AND THINGS PURSUANT RULE 34(b) F.R.C.P. ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF. I AM AWARE THAT ANY FALSE STATEMENTS MADE HEREIN WILL SUBJECT ME TO THE PENALTIES OF PERJURY AS SET FORTH IN 28 U.S.C., § 1746.

PROOF OF SERVICE

I, COREY O. WHITE, VERIFY THAT ON THIS 20th DAY OF JAN 2003. I AM FORWARDING BY UNITED STATES FIRST CLASS MAIL A COPY OF THE ATTACHE REQUEST TO:

ROBIN B. ARNOLD ESQ.
CITY OF PHILADELPHIA LAW DEPARTMENT
1515 ARCH STREET 14th FL.
PHILA. PA, 19102, 1595

MICHEAL E. KUNZ
CLERK OF THE COURT
UNITED STATES DISTRICT COURT
PHILA. PA, 19106-1797


COREY O. WHITE PRO'SE
PLAINTIFF, S.C.I. RETREAT
660 STATE ROUTE 11
HUNLOCK CREEK PA. 18621-3136



CITY OF PHILADELPHIA

LAW DEPARTMENT
One Parkway
1515 Arch Street
Philadelphia, PA 19102-1595

(215) 683-5447 Direct Dial
(215) 683-5397 Fax

February 27, 2003

Corey O. White, Pro Se
EB 0632
SCI -Retreat
660 State Route 11
Hunlock Creek, PA 18621-9580

RE: Corey White v. City of Philadelphia, et al.
Civil Action No. 02-4066

Dear Mr. White:

Thank you for your letter of February 24, 2003, which I received on February 27th. Answers to plaintiff's discovery are actually not due until March 3, 2003 (since March 2nd is a Sunday). I do, however, respectfully request a 30-day continuance from today's date, or until March 28, 2003 within which to respond to plaintiff's discovery. Absent word from you to the contrary, I will assume that you have no objections to this request for an extension, and will proceed accordingly.

Thank you for your kind cooperation in this regard.

Very truly yours,

A handwritten signature in cursive script, reading "Robin B. Arnold".

Robin B. Arnold

EXHIBIT “B”



FILE COPY

CITY OF PHILADELPHIA

LAW DEPARTMENT
One Parkway
1515 Arch Street
Philadelphia, PA 19102-1595

(216) 683-5447 Direct Dial
(215) 683-5397 Fax

March 10, 2003

Corey O. White, Pro Se
EB 0632
SCI -Retreat
660 State Route 11
Hunlock Creek, PA 18621-9580

RE: Corey White v. City of Philadelphia, et al.
Civil Action No. 02-4066

Dear Mr. White:

Thank you for your letter of March 4, 2003. Please be advised that I agree to respond to your discovery requests in accordance with the Federal Rules of Civil Procedure. I reserve the right to make all appropriate objections. I will make every good faith effort to respond to your discovery on or before March 28th, and I thank you for extending me this courtesy.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Robin B. Arnold".

Robin B. Arnold
Deputy City Solicitor

EXHIBIT “C”



CITY OF PHILADELPHIA

LAW DEPARTMENT
One Parkway
1515 Arch Street
Philadelphia, PA 19102-1595

Nelson A. Diaz
City Solicitor

ROBIN ARNOLD
Deputy City Solicitor
Civil Rights Litigation Unit
(215) 683-5447/683-5397 (fax)

March 20, 2003

Corey O. White, Pro Se
EB 0632
SCI – Retreat
660 State Route 11
Hunlock Creek, PA 18621-9580

RE: Corey O. White v. City of Philadelphia, et al.
Civil Action, No. 02-4066

Dear Mr. White:

Enclosed please find Defendants' Initial Disclosures and Responses to Plaintiff's Request for Production of Documents.

Very truly yours,

A handwritten signature in cursive script that reads "Robin B. Arnold".

ROBIN B. ARNOLD
Deputy City Solicitor
(215) 683-5447 FAX: 683-5397

rba/rmz
Enclosures

Corey WHITE,	:	CIV. NO.
	:	
Plaintiff,	:	02-4066
	:	
v.	:	
	:	
CITY OF PHILADELPHIA, et al.,	:	
	:	
Defendants.	:	

Defendants City of Philadelphia, Mayor John Street, Officer Blocker, Officer Iannacone, Officer McDonald, and Officer Roman, in accordance with and pursuant to Federal Rules of Civil Procedure 26, and 33 and Rule 26.1 of this Court's Local Civil Rules, hereby responds to Plaintiff's Request for Production of Documents as follows:

A. Defendant objects to each document request to the extent it seeks the disclosure of information that is protected by the attorney-client privilege, the work-product doctrine, the deliberative process privilege, the law enforcement privilege, or any other applicable privilege.

B. Defendant objects to each interrogatory to the extent it seeks documents that exceed the scope of permissible discovery as set forth in Federal Rule of Civil Procedure 26.

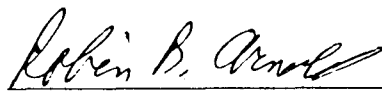
C. Defendant reserves any and all objections to the use at trial of any documents or information produced by Defendant during discovery.

D. Defendant reserves the right to supplement or amend its responses based upon the discovery of additional documents or information.

II. RESPONSES

1. See Photo of Plaintiff taken at CFCF, Philadelphia Prisons enclosed herein. Other than the Photo, Defendants do not currently possess any responsive materials after reasonable investigation. In the event that Defendants receive responsive materials upon receipt, said materials will be forwarded to Plaintiff immediately.
2. See Internal Affairs File of Officers Iannacone, Blocker and Roman enclosed herein. By way of further answer, Officer McDonald has no records with Internal Affairs.
3. Objection. Defendants have no possession or control of documents sought in this Request. By way of further answer, Plaintiff should subpoena documents from the appropriate third party pursuant to the Federal Rules of Civil Procedure.
4. See Mercy Hospital records (3 pages), Transfer Health Information 8/28/02, Confidential Medical Screening 8/29/02, Admission Data, Prison Health Services Dental Intake Screening Sheet 8/29/02, Transfer Health Information 9/18/02, Confidential Medical Screening 9/19/02, Progress Notes, Dental Intake Screening Sheet 9/19/02.
5. Objection. Defendants have no possession or control of documents sought in this Request. By way of further answer, Plaintiff should subpoena documents from documents from the appropriate third party pursuant to the Federal Rules of Civil Procedure.

By way of further answer, Defendants attach copies of all documents enumerated in their Initial Disclosures.

BY: 
Robin B. Arnold
Deputy City Solicitor
1515 Arch Street, 14th Floor
Philadelphia, PA 19102

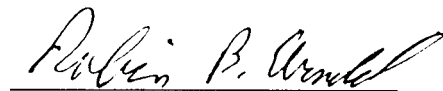
DATE: March 20, 2003

CERTIFICATE OF SERVICE

I, Robin B. Arnold, certify that, on this day, I caused a true and correct copy of Defendants' attached responses to Plaintiff's Request for Production of Documents to be delivered to the following counsel by regular U.S. mail:

Corey O. White, Pro Se
EB 0632
SCI - Retreat
660 State Route 11
Hunlock Creek, PA 18621-9580

BY:



Robin B. Arnold
Deputy City Solicitor
1515 Arch Street, 14th Floor
Philadelphia, PA 19102

DATE: March 20, 2003

EXHIBIT “D”

FILE COPY

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Corey WHITE,	:	CIV. NO.
	:	
Plaintiff,	:	02-4066
	:	
v.	:	
	:	
CITY OF PHILADELPHIA, et al.,	:	
	:	
Defendants.	:	

**DEFENDANTS' INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26 (a)**

REQUIRED DISCLOSURES 26 (a) (1) (A):

The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses.

1. All known Police Department employees likely to have discoverable information relevant to the facts alleged in plaintiff's complaint are identified in the materials listed below in part (1)(B). These individuals include, but are not limited to, PO Michael Iannacone, Det. JP Lanagan, PO Eric Blocker, PO Jose Roman, PO Claudia McDonald, PO Alfonse Johnson, Denise Webster, Det. Winkis, Harrison Brenda, and Dr. Lutz.
2. Police designees to negate Plaintiff's Municipal Liability Claims, if necessary.
3. Medical expert to be designated, if necessary.
4. Plaintiff.
5. Defendants.

REQUIRED DISCLOSURES 26 (a) (1) (B):

A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party.

1. Investigation Report 75-49
2. CMR Control Card for Davis, Gregory
3. Photograph of Inmate at CFCF
4. Detainee's Medical Checklist
5. Transfer Health Information 8/28/02, 9/18/02
6. Confidential Medical Screening for Gregory Davis 8/29/02, 9/19/02
7. Admission Data
8. Prison Health Services Dental Intake Screening Sheet 8/29/02, 9/19/02
9. PHS Progress Notes
10. Custody Report for White, Cory
11. Arrest Report (DC No. 02-12-9658)
12. Incident Report (DC No. 02-12-9655)
13. Incident Report (DC No. 02-12-9656)
14. Incident Report (DC No. 02-12-9657)
15. Incident Report (DC No. 02-12-9658)
16. Incident Report (DC No. 02-12-9670)
17. Arrest Photo of Gregory Davis
18. CAD Report
19. Patrol Activity Log
20. Assignment Sheet
21. Cell Log
22. Arrest Report (DC No. 02-12-7602).
23. Plaintiff's criminal records, including arrest and court history.
24. Internal Affairs files of PO Blocker, PO Iannacone, and PO Roman.
25. Detective Langan's File (including Photograph Request Forms, Industrial Medical Care Provider Referral Authorization, Temple University Hospital - Emergency Department Discharge Instructions, Investigation Reports DC No. 02-12-9656 / 9670 / 9658, Investigation Interview Record of Michael Iannacone, Computer Print-Out of Complainant Denise Webster, Incident Report DC No. 02-12-9713, Property Receipt No. 2376491, Investigation Interview Record of Claudia McDonald, Report of Field Tester, NCIC print-out, General Computer Message, Offender Processing Ticket, Arrest Reports for 1/30/02 and 2/6/02, Arrest Photo of Gregory Davis dated 4/3/01, Investigation Interview Record of Alfonse Johnson, Biographical Information Report, Investigation Interview Record of Eric Blocker, Investigation Interview Record of Jose Roman, Investigation Report Computer Print-Outs, and 5 black and white Photos of Scene).
26. Photographs of Officers Iannacone and Blocker's injuries

All documents and/or witnesses may be obtained and/or contacted through the Philadelphia Police Department, via the undersigned counsel. Plaintiff's criminal records are in the possession and control of the Philadelphia County Court of Quarter Sessions.

REQUIRED DISCLOSURES 26 (a) (1) (C):

A computation of any category of damages claimed by the disclosing party.

1. Not applicable.

REQUIRED DISCLOSURES 26 (a) (1) (D):

Any insurance agreement

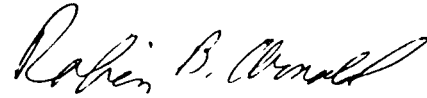
1. The City of Philadelphia is self-insured.

As discovery and investigation continue, Defendants reserve the right to supplement these disclosures. Supplemental disclosures will be made in the form of formal responses to Plaintiff's discovery requests to avoid duplication.

If Plaintiff has not yet done so, please submit initial disclosures pursuant to Federal Rule of Civil Procedure 26(a) promptly.

Thank you for your cooperation in this matter.

BY:



Robin B. Arnold
Deputy City Solicitor
1515 Arch Street, 14th Floor
Philadelphia, PA 19102

DATE: March 20, 2003

CERTIFICATE OF SERVICE

I, Robin B. Arnold, Deputy City Solicitor, hereby certify that a true and correct copy of Defendants' Disclosures was served by regular U.S. mail upon Plaintiff at the following address:

Corey O. White, Pro Se
EB 0632
SCI - Retreat
660 State Route 11
Hunlock Creek, PA 18621-9580



Robin B. Arnold
Deputy City Solicitor

DATE: March 20, 2003